

unsealed 5/29/08 ap
~~SECRET~~

FILED
08 MAY 23 PM 2:56

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY: *AV*

DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

July 2007 Grand Jury

10	UNITED STATES OF AMERICA,)	Criminal Case No. <u>08CR0274-LAB</u>
11	Plaintiff,)	
12	v.)	<u>I N D I C T M E N T</u>
13	JORDAN ARNOLD (1),)	<u>(Superseding)</u>
14	CHRISTOPHER BLACK (2),)	Title 18, U.S.C.,
15	JESSICA KING (3),)	Secs. 1591(a)(1), (a)(2) and
16	Defendants.)	(b)(2) - Sex Trafficking of
17)	Children; Title 18, U.S.C.,
)	Sec. 2422(b) - Coercion and
)	Enticement of Juvenile into
)	Prostitution; Title 18, U.S.C.,
)	Sec. 2 - Aiding and Abetting;
)	Title 18, U.S.C., Sec. 371 -
)	Conspiracy

The grand jury charges:

Count 1

CONSPIRACY TO ENGAGE IN SEX TRAFFICKING OF CHILDREN

[18 U.S.C. § 371]

OBJECT OF THE CONSPIRACY

1. From on or about August 1, 2007, until and including October 11, 2007, within the Southern District of California, and elsewhere, defendants JORDAN ARNOLD, CHRISTOPHER BLACK and JESSICA KING, in and affecting interstate commerce, did knowingly conspire and agree with each other, and other persons known and unknown to the grand jury, to knowingly recruit, entice, harbor, transport, provide,

CPT:fer(2):San Diego
5/23/08

ap 31

1 and obtain by any means juveniles, and did benefit financially and by
2 receiving a thing of value, from participation in a venture engaged
3 in such acts, knowing that the juvenile had not attained the age of
4 18 years and would be caused to engage in commercial sex acts; in
5 violation of Title 18, United States Code, Section 1591.

6 **METHODS AND MEANS**

7 2. From on or about a date unknown, but no later than August
8 1, 2007, to and including October 11, 2007, defendants JORDAN ARNOLD,
9 CHRISTOPHER BLACK and JESSICA KING recruited, persuaded, and
10 transported juvenile females to perform acts of prostitution (exchange
11 of sex acts for money) for the defendants' financial benefit.

12 3. The individuals hereinafter referred to as "the juveniles"
13 include females identified as A. A., L. A., H. C., and K. W.

14 4. Defendants ARNOLD and BLACK recruited and enticed the
15 juveniles to perform acts of prostitution, the proceeds from which the
16 defendants intended to, and did, receive and keep.

17 5. Defendants ARNOLD, BLACK and KING instructed the juveniles
18 how to solicit prostitution customers ("johns") for acts of
19 prostitution ("dates"), including how to dress, how to pose for
20 photographs used in internet ads soliciting "dates," what language to
21 put in internet ads soliciting "dates," how to post internet ads
22 soliciting "dates," what language to use on the telephone or in person
23 to solicit "dates," how to perform sex acts, and how much money to
24 charge in exchange for the performance of particular sex acts.

25 6. Defendants ARNOLD, BLACK and KING took digital photographs
26 of the juveniles, as the juveniles wore lingerie and posed
27 provocatively, which were subsequently saved onto computers and
28 //

1 uploaded onto the internet and the Craigslist website to create ads
2 soliciting "johns."

3 7. Defendants ARNOLD, BLACK, and KING posted, or instructed the
4 juveniles to post, ads onto the Craigslist website to solicit "johns."

5 8. Defendants ARNOLD and BLACK provided telephones for the
6 juveniles to receive calls from customers responding to Craigslist ads
7 soliciting "johns," and for the juveniles to contact one of the
8 defendants to pick up the juveniles from a hotel or elsewhere after
9 completion of a date.

10 9. Defendants ARNOLD, BLACK and KING drove the juveniles to
11 hotels and other locations within the Southern District of California
12 to perform sex acts with "johns" solicited through Craigslist ads, and
13 picked up the juveniles from the same locations after sex acts had
14 been completed.

15 10. Defendants ARNOLD and BLACK collected from the juveniles
16 proceeds obtained by the juveniles in exchange for completed sex acts
17 performed in response to Craigslist ads.

18 **OVERT ACTS**

19 11. In furtherance of the conspiracy and to achieve the objects
20 thereof, the defendants and their co-conspirators, known and unknown
21 to the grand jury, committed and caused to be committed the following
22 overt acts, among others, within the Southern District of California:

23 a. Between August 1, 2007 and August 15, 2007, Defendant
24 ARNOLD recruited and enticed A. A. to work as a prostitute for his
25 financial benefit.

26 b. Between August 15, 2007 and September 1, 2007,
27 Defendant BLACK recruited and enticed L. A. to work as a prostitute
28 for his financial benefit.

1 c. Between August 15, 2007 and September 1, 2007,
2 Defendant ARNOLD instructed Defendant KING to teach A. A. and L. A.
3 how to solicit "johns" and how to perform sex acts as a prostitute.

4 d. Between August 15, 2007 and September 1, 2007,
5 Defendant KING taught A. A. and L. A. how to solicit "johns" and how
6 to perform sex acts as a prostitute.

7 e. Between August 15, 2007 and October 11, 2007, Defendant
8 BLACK instructed L. A. that her picture and phone number would be on
9 the internet and that she would receive calls soliciting sex as well
10 as how much money to charge for acts of prostitution.

11 f. Between August 15, 2007 and September 1, 2007,
12 Defendant KING used Defendant ARNOLD's mobile telephone to take
13 photographs of A. A. and L. A. in lingerie and provocative poses for
14 ads which would be posted on the Craigslist website to solicit
15 "johns."

16 g. Between August 15, 2007 and September 15, 2007,
17 Defendant BLACK took photographs of L. A. at his apartment, while she
18 was in lingerie and provocative poses for an ad which would be posted
19 on the Craigslist website to solicit "johns."

20 h. Between August 15, 2007 and October 11, 2007,
21 Defendants ARNOLD and BLACK provided access to their computers to
22 A. A. with instructions that A. A. was to post Craigslist ads
23 depicting herself to solicit "johns."

24 i. Between August 15, 2007 and October 11, 2007, Defendant
25 BLACK used his computer and other computers to post Craigslist ads
26 depicting L. A. to solicit "johns" for L. A.

27 j. Between August 1, 2007 and October 11, 2007, Defendant
28 ARNOLD gave a mobile telephone to A. A. to use to receive calls from

1 "johns" in response to the Craigslist ads and to communicate with
2 Defendant ARNOLD.

3 k. Between August 15, 2007 and October 11, 2007, Defendant
4 BLACK gave a mobile telephone to L. A. to use to receive calls from
5 "johns" in response to the Craigslist ads and to communicate with
6 Defendant BLACK.

7 l. Between August 1, 2007 and October 11, 2007, Defendant
8 ARNOLD directed A. A. to make arrangements by telephone to meet
9 "johns" at various hotels in the Mission Valley or Sports Arena areas
10 of San Diego.

11 m. Between August 1, 2007 and October 11, 2007, Defendants
12 ARNOLD, BLACK and KING drove A. A. to hotels where they knew
13 A. A. would perform acts of prostitution arranged in response to ads
14 depicting her and posted on Craigslist.

15 n. Between August 15, 2007 and October 11, 2007,
16 Defendants ARNOLD and BLACK drove L. A. to hotels where they knew
17 L. A. would perform acts of prostitution arranged in response to ads
18 depicting her and posted on Craigslist.

19 o. Between August 1, 2007 and October 11, 2007, Defendant
20 ARNOLD picked up A. A. from various locations in San Diego after she
21 had completed acts of prostitution.

22 p. Between August 15, 2007 and October 11, 2007, Defendant
23 BLACK picked up L. A. from various locations in San Diego after she
24 had completed acts of prostitution.

25 q. Between August 1, 2007 and October 11, 2007, Defendant
26 ARNOLD collected from A. A. the proceeds she received in exchange for
27 acts of prostitution.

28 //

1 r. Between August 15, 2007 and October 11, 2007, Defendant
2 BLACK collected from L. A. the proceeds she received in exchange for
3 acts of prostitution.

4 s. On September 13, 2007, Defendant KING posted an ad
5 depicting A. A. onto the Craigslist website to solicit "johns."

6 t. On or about September 14, 2007 and September 15, 2007,
7 Defendant ARNOLD recruited and enticed H. C. and K. W. to work as
8 prostitutes for his financial benefit.

9 u. On or about September 15, 2007, at a hotel in the
10 Mission Valley area of San Diego, Defendant ARNOLD used the camera in
11 his mobile telephone to take photographs of H. C. and K. W. while they
12 were dressed in lingerie and in provocative poses, which were
13 subsequently used in ads posted on Craigslist to solicit "johns."

14 v. On or about September 18, 2007, Defendant ARNOLD
15 instructed A. A. to teach H. C. and K. W. how to post ads on Craiglist
16 and how to solicit "dates" for prostitution.

17 w. Between September 14, 2007 and October 11, 2007,
18 Defendant ARNOLD instructed K. W. that he would break her jaw if she
19 reported him to the police, talked back to Defendant ARNOLD, or did
20 not do as he instructed her.

21 x. Between September 14, 2007 and October 11, 2007,
22 Defendant ARNOLD instructed H. C. to make arrangements by telephone
23 to meet "johns" at various hotels in the Mission Valley or Sports
24 Arena areas of San Diego, arranged in response to ads depicting her
25 and posted on Craigslist.

26 //

27 //

28 //

1 y. Between September 14, 2007 and October 11, 2007,
2 Defendant ARNOLD gave a mobile telephone to H.C. to use to receive
3 calls from "johns" in response to the Craigslist ads, and to
4 communicate with Defendant ARNOLD.

5 z. Between September 14, 2007 and October 11, 2007,
6 Defendant ARNOLD drove H.C. to hotels where he knew H. C. would
7 perform acts of prostitution arranged in response to ads depicting her
8 and posted on Craigslist.

9 aa. Between September 14, 2007 and October 11, 2007,
10 Defendant ARNOLD picked up H. C. from various locations in San Diego
11 after H. C. completed acts of prostitution.

12 bb. Between September 14, 2007 and October 11, 2007,
13 Defendant ARNOLD collected from H. C. the proceeds H. C. received in
14 exchange for acts of prostitution.

15 cc. On October 6, 2007, Defendants ARNOLD and BLACK rented
16 rooms at a hotel in the Mission Valley area of San Diego for use by
17 A. A. and L. A. to perform acts of prostitution with "johns" solicited
18 through Craigslist ads depicting A. A. and L. A., and posted on the
19 same date.

20 dd. On October 7, 2007, Defendants ARNOLD and BLACK rented
21 a room at a hotel in the Mission Valley area of San Diego for use by
22 A. A., L. A. and H. C. to perform acts of prostitution with "johns"
23 solicited through Craigslist ads depicting A. A., L. A. and H. C., and
24 posted on the same date.

25 //

26 //

27 //

28 //

1 ee. On October 11, 2007, Defendant ARNOLD drove H. C. to
2 a hotel in the San Diego area to perform an act of prostitution with
3 a date solicited through a Craigslist ad depicting H. C. and posted
4 on the same date.

5 All in violation of Title 18, United States Code, Section 371.

6 Count 2

7 CONSPIRACY TO COERCE AND ENTICE JUVENILES INTO PROSTITUTION

8 [18 U.S.C. § 371]

9 **OBJECT OF THE CONSPIRACY**

10 12. From on or about August 1, 2007, until and including
11 October 11, 2007, within the Southern District of California, and
12 elsewhere, defendants JORDAN ARNOLD, CHRISTOPHER BLACK and JESSICA
13 KING, knowingly conspired and agreed with each other, and other
14 persons known and unknown to the grand jury, to use the mail and any
15 facility and means of interstate or foreign commerce, to knowingly
16 persuade, induce, entice, and coerce an individual who had not
17 attained the age of 18 years, to engage in prostitution and any sexual
18 activity for which any person can be charged with a criminal offense;
19 in violation of Title 18, United States Code, Sections 2422(b).

20 **METHODS AND MEANS**

21 13. The Government incorporates by reference Paragraphs 2
22 through 10.

23 **OVERT ACTS**

24 14. The grand jury hereby repeats and realleges Paragraph 11 as
25 fully set forth herein.

26 All in violation of Title 18, United States Code, Section 371.

27 //

28 //

Count 3

1
2 From on or about August 1, 2007, until and including October 11,
3 2007, within the Southern District of California, defendants JORDAN
4 ARNOLD, CHRISTOPHER BLACK and JESSICA KING, in and affecting
5 interstate commerce, did knowingly recruit, entice, harbor, transport,
6 provide and obtain by any means A. A., (a juvenile), and did benefit
7 financially and by receiving a thing of value, from participation in
8 a venture engaged in such acts, knowing that A. A. had not attained
9 the age of 18 years and would be caused to engage in commercial sex
10 acts; all in violation of Title 18, United States Code, Sections
11 1591(a)(1), (a)(2), (b)(2), and 2.

Count 4

12
13 From on or about August 1, 2007, until and including
14 October 11, 2007, within the Southern District of California,
15 defendants JORDAN ARNOLD, CHRISTOPHER BLACK and JESSICA KING, using
16 the mail and any facility and means of interstate or foreign commerce,
17 did knowingly persuade, induce, entice, and coerce an individual who
18 had not attained the age of 18 years, namely A. A., (a juvenile), to
19 engage in prostitution and any sexual activity for which any person
20 can be charged with a criminal offense; all in violation of Title 18,
21 United States Code, Sections 2422(b) and 2.

Count 5

22
23 From on or about August 1, 2007, until and including
24 October 11, 2007, within the Southern District of California,
25 defendants JORDAN ARNOLD, CHRISTOPHER BLACK and JESSICA KING, in and
26 affecting interstate commerce, did knowingly recruit, entice, harbor,
27 transport, provide and obtain by any means L. A., (a juvenile), and
28 did benefit financially and by receiving a thing of value, from

1 participation in a venture engaged in such acts, knowing that L. A.
2 had not attained the age of 18 years and would be caused to engage in
3 commercial sex acts; all in violation of Title 18, United States Code,
4 Sections 1591(a)(1), (a)(2), (b)(2), and 2.

5 Count 6

6 From on or about August 1, 2007, until and including
7 October 11, 2007, within the Southern District of California,
8 defendants JORDAN ARNOLD, CHRISTOPHER BLACK and JESSICA KING, using
9 the mail and any facility and means of interstate or foreign commerce,
10 did knowingly persuade, induce, entice, and coerce an individual who
11 had not attained the age of 18 years, namely L. A., (a juvenile), to
12 engage in prostitution and any sexual activity for which any person
13 can be charged with a criminal offense; all in violation of Title 18,
14 United States Code, Sections 2422(b) and 2.

15 Count 7

16 From on or about August 1, 2007, until and including
17 October 11, 2007, within the Southern District of California,
18 defendant JORDAN ARNOLD, in and affecting interstate commerce, did
19 knowingly recruit, entice, harbor, transport, provide and obtain by
20 any means H. C., (a juvenile), and did benefit financially and by
21 receiving a thing of value, from participation in a venture engaged
22 in such acts, knowing that H. C. had not attained the age of 18 years
23 and would be caused to engage in commercial sex acts; all in violation
24 of Title 18, United States Code, Sections 1591(a)(1), (a)(2),
25 and (b)(2).

26 //

27 //

28 //

Count 8

1
2 From on or about August 1, 2007, until and including
3 October 11, 2007, within the Southern District of California,
4 defendant JORDAN ARNOLD, using the mail and any facility and means of
5 interstate or foreign commerce, did knowingly persuade, induce,
6 entice, and coerce an individual who had not attained the age of 18
7 years, namely H. C., (a juvenile), to engage in prostitution and any
8 sexual activity for which any person can be charged with a criminal
9 offense; all in violation of Title 18, United States Code,
10 Section 2422(b).

Count 9

11
12 From on or about August 1, 2007, until and including
13 October 11, 2007, within the Southern District of California,
14 defendant JORDAN ARNOLD, in and affecting interstate commerce, did
15 knowingly recruit, entice, harbor, transport, provide and obtain by
16 any means K. W., (a juvenile), and did benefit financially and by
17 receiving a thing of value, from participation in a venture engaged
18 in such acts, knowing that K. W. had not attained the age of 18 years
19 and would be caused to engage in commercial sex acts; all in violation
20 of Title 18, United States Code, Sections 1591(a)(1), (a)(2),
21 and (b)(2).

22 //

23 //

24 //

25 //

26 //

27 //

28 //

Count 10

From on or about August 1, 2007, until and including October 11, 2007, within the Southern District of California, defendant JORDAN ARNOLD, using the mail and any facility and means of interstate or foreign commerce, did knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, namely K. W., (a juvenile), to engage in prostitution and any sexual activity for which any person can be charged with a criminal offense; all in violation of Title 18, United States Code, Section 2422(b).

DATED: May 23, 2008.

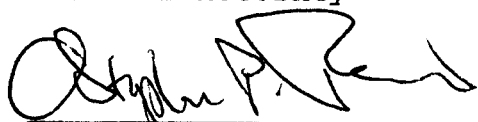
A TRUE BILL:



Foreperson

KAREN P. HEWITT
United States Attorney

By:



CHRISTOPHER P. TENORIO
Assistant U.S. Attorney